

Michael Van Wies
8504 Horseshoe Bend Lane
Ooltewah, TN 37363-5627

Bus: 423-715-1800

Res: 423-238-9081

Fax: 423-238-9088

REC'D TN
REGULATORY AUTH.
JUN 17 AM 10 50
OFFICE OF THE
EXECUTIVE SECRETARY

June 12, 2002

VIA FACSIMILE & FedEx:

K. David Waddell, Executive Secretary
Jonathan N. Wike, Hearing Officer
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505
800-342-8359x142 (Mr. Waddell)
800-342-8359x171 (Mr. Wike)
Fax: 615-741-5015

Docket No. 02-00058

Dear Gentlemen;

Here is my reply to CenturyTel's request for discovery.

Thank you for your time and patience.

Yours truly,



Michael Van Wies

June 11, 2002

VIA FACSIMILE & FEDEX

R. Dale Grimes
Bass, Berry & Sims, PLC
AmSouth Center
315 Deaderick Street, Suite 2700
Nashville, TN 37238

***Re: Complaint of Michael Van Wies Against CenturyTel of
Ooltewah Collegedale, Inc., TRA Docket No. 02-00058***

Dear Mr. Grimes:

Enclosed please find the responses to Request for Discovery.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael VanWies", with a stylized flourish at the end.

Michael VanWies

CC: K. David Waddell (w/enclosures)

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**COMPLAINT OF MICHAEL VANWIES
AGAINST CENTURYTEL OF
OOLTEWAH-COLLEGE DALE, INC.**

Docket No. 02-00058

**RESPONSE OF MICHAEL VANWIES TO REQUEST FOR DISCOVERY FROM
CENTURYTEL**

Comes now Petitioner, Michael Van Wies, in response to Respondent CenturyTel's request for Discovery, which is attached hereto, as follows:

1. Petitioner often uses the word "we" to refer to himself. In other instances the word "we" refers to the following people and used with verbal permission.

- a) Christine Peters: 8507 Horseshoe Bend Lane,
Ooltewah, Tennessee, 37363, 423-238-9081
- b) Jerry & Wanda Westmoreland: 8507 Horseshoe Bend
Lane, Ooltewah, Tennessee 37363, 423-238-5183
- c) Carl & Mary Furtney: 4236 Howardsville Road,
Apison, Tennessee 37302, 423-236-4123

All of the above named parties are CenturyTel Customers and have various related quality and service issues.

2. Petitioner has not at this time fully identified the claims, if any, he will choose not to pursue, and intends to fully pursue all claims stated in the complaint with the appropriate agency.

3. Petitioners have not made a decision at this time, in case we wish to get assistance from other agencies that may or may not be involved.

4. Petitioner has not made a decision at this time, in case we wish to get assistance from other agencies that may or may not be involved.

5. The following is a list of Petitioner's experience in the telecommunications industry:

CABLE SPLICERS HELPER; CABLE SPLICING
TECHNICIAN; NEW EMPLOYEE INDUCTION; POT METHOD OF WIPING LEAD;
CABLE FAULT LOCATING; ONE MAN AERIAL LIFT TRUCK TRAINING;
CABLE PRESSURE MONITORING SYSTEM; DRIVERS TRAINING; BELL
SYSTEM FIRST AID; ADVANCED DRIVER PERFORMANCE; SAFE POLE
CLIMBING WITH HOOKS; STATIONARY OBJECTS DRIVING SKILLS; CROMS
OLD DATABASE; CRAFT ACCESS TERMINAL FOR CUSTOMERS; 3M
MODULAR SPLICING; SIEMENS UNIVERSAL CLOSURE; DRIVERS
REVALIDATION; PANEL SWITCHING INTRO.; CROSSBAR-1 SWITCHING
INTRO.; "N" CARRIER; "L" CARRIER; COAXIAL CABLE SPLICING AND
TESTING; VIDEO CABLE SPLICING AND TESTING; 1A-ESS SWITCHING; PC
DOS; PROGRAMMING IN DBASE III; PERSONAL COMPUTERS IN BUSINESS;
BELL SYSTEM MODULAR FIRST AID; CABLE SPLICING TECHNICIANS
INITIATES-RECERTIFICATION; ADVANCED LOTUS 1-2-3; BASIC
PROGRAMMING; HAZCOM; D.O.T. MCSR; DBASE III/III; PERSONAL
COMPUTER SEMINAR; FIRESAFETY & SECURITY AT BELL
SYSTEM/NYNEX/BELL ATLANTIC; CABLE PRESSURIZATION CPAMS
OVERVIEW; MCINTIRE AIR DRYER TRAINING AND CERTIFICATION;
DIELECTRIC AIR DRYER TRAINING AND CERTIFICATION; CHATLOS AIR
DRYER TRAINING AND CERTIFICATION; LOURDES AIR DRYER TRAINING
AND CERTIFICATION; S.L.C. 96 TRAINING AND CERTIFICATION; S.L.C. 96
MODE-1 TRAINING AND CERTIFICATION; S.L.C. 96 MODE-2 TRAINING AND
CERTIFICATION; S.L.C. 96 SERIES 5 TRAINING AND CERTIFICATION;
NORTEL DMS-100; NORTEL LITESPAN 2000 INSTALLATION
& MAINTENANCE; CABLE FAULT LOCATING-RECERTIFICATION; NEC FD
1840A TRAINING AND CERTIFICATION; INSTALLATION SUBURBAN
RECERTIFICATION; ISDN I & M INSTALLATION TRAINING AND
RECERTIFICATION; BASIC CONCEPTS OF MANAGING; WORKING WITH

PERSONAL COMPUTERS; FUNDAMENTALS OF EXCELLENCE; LET'S TALK COMMUNICATION; WRITE RIGHT WRITTEN COMMUNICATION; DEVELOPING CAREER OPTIONS; TEST TAKING AND THINKING SKILLS; HUMAN RELATIONS ON THE JOB; 5-ESS; D 4 CHANNEL BANK; PRINCIPLES OF DIGITAL TRANSMISSION; FIBER OPTIC SPLICING; FIBER OPTIC PLACING; DDM-1000; DDM-2000; LUCENT FT-2000; LUCENT DACS-II; LUCENT DACS-IV; TELLABS TITAN-5500; LUCENT CASCADE CBX-500; XYLAN SWITCH: DSX WIRING; T-1 CARRIER.

- a. All employment has been with a Bell Company from which Petitioner retired.

6. Petitioner objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, not reasonably calculated to lead to discovery of admissible evidence.

7. Petitioner intends to call the following expert:

John Russell, JMR Technical Services, Manager, 4123 East
Freedom Circle, Ooltewah, Tennessee 37363, 423-760-3908

Subparagraphs A-F are not applicable in this matter.

8. Petitioner objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, not reasonably calculated to lead to discovery of admissible evidence.

9. A-G all files and relative data have been given to the TRA, and is already posted on their website.

10. Petitioner was a Wire Watcher subscriber from 11/1999 through early 2000.

11. A-D: See Attached list.

12. N/A

13. See Response to Request for Admissions:

II. REQUEST FOR ADMISSIONS

1. Admit; we contacted CenturyTel, when we first moved into area.
2. Admit; CenturyTel had no jobs available for anyone.
3. Denied
4. Denied: Petition not for personal gain but for improvements to infrastructure and telecommunications network, and to provide their customers with increased quality of service for goods and services, that they pay full price for but only receive partial products, goods and services.
5. Denied
6. Denied
7. Denied: Complaint was against Comcast contractor not service from Comcast.
8. Denied
9. Denied
10. Denied
11. Denied

III. REQUEST FOR PRODUCTION

In response to the Requests for Production, all requested documents and Files, as well as and relative data have been provided to the TRA and are already posted on their website.

Respectfully submitted,



Michael Van Wies
Petitioner
Pro Se

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing document has been duly served upon:

R. Dale Grimes
Bass, Berry & Sims, PLC
AmSouth Center
315 Deaderick Street, Suite 2700
Nashville, TNM 37238

either by hand delivery or by placing a copy of same in the United States mail, properly addressed with sufficient postage affixed thereto to carry same to its destination.

This 12 day of June, 2002.



Michael Van Wies

TTA Tennessee
Telecommunications Association

Tier I Members



Ardmore Telephone Company
P.O. Box 549
30190 Ardmore Avenue
Ardmore, TN 38449

Voice: 256.423.2131
FAX: 256.423.2208

E-Mail: ardmore@ardmore.net

Web Site: www.ardmore.net



Bell South
333 Commerce Street
Nashville, TN 37201-3300

Voice: 615.214.4066
FAX: 615.214.8867

E-Mail: [Gwen Spalding](mailto:Gwen.Spalding)

Web Site: www.bellsouth.com



BLC Communications
P.O. Box 670
311 North Chancery Street
McMinnville, TN 37110

Voice: 931.668.4132
FAX: 931.668.6646

E-Mail: lknowles@blomand.net

Web Site: www.blomand.net



Bledsoe Telephone Cooperative
P.O. Box 609
203 Cumberland Avenue
Pikeville, TN 37367

Voice: 423.447.2121
FAX: 423.447.2498

E-Mail: glanderson@bledsoe.net

Web Site: www.bledsoe.net



CenturyTel of Adamsville
P.O. Box 405
116 N. Oak Street
Adamsville, TN 38130

Voice: 901.632.3311
FAX: 901.632.0232

Web Site: www.centurytel.net



CenturyTel of Claiborne
P.O. Box 100
507 Main Street
New Tazewell, TN 37825

Voice: 423.626.4242
FAX: 423.626.5224

Web Site: www.centurytel.net



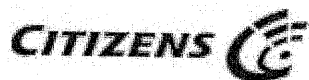
CenturyTel of Ooltewah-Collegedale
P.O. Box 782
5616 Main Street
Ooltewah, TN 37363

Voice: 423.238.4102

FAX: 423.238.5699

E-Mail: harleyman@centuryinter.net

Web Site: www.centurytel.net



**Citizens Communications
250 South Franklin Street
Cookeville, TN 38501**

Voice: 931.528.0519

FAX: 931.528.0604

E-Mail: mbyrd@czn.com

Web Site: www.citizenscommunications.com



**Concord Telephone Exchange
P.O. Box 22610
701 Concord Road
Knoxville, TN 37922-0610**

Voice: 865.671.5150

FAX: 865.966.9000



**Crockett Telephone Company
P.O. Box 10
224 East Main Street
Bradford, TN 38316**

Voice: 901.742.2211

FAX: 901.742.2212



**DTC Communications
P.O. Box 247
111 High Street
Alexandria, TN 37012-0247**

Voice: 615.529.2151

FAX: 615.529.2194

E-Mail: Wecare@dtccom.net

Web Site: www.dtccom.net

**Highland Telephone Cooperative
P.O. Box 119
7840 Morgan County Highway
Sunbright, TN 37872-0119**

Voice: 423.628.2121

FAX: 423.628.2409

E-Mail: highland@highland.net

Web Site: www.highland.net



**Humphreys County Telephone Company
P.O. Box 552
203 Long Street
New Johnsonville, TN 37134-0552**

Voice: 931.535.2206

FAX: 931.535.3309

Loretto Telephone

**Loretto Telephone Company
P.O. Box 130
136 South Main Street
Loretto, TN 38469**

Voice: 931.853.4351

FAX: 931.853.4329

E-Mail: loretto@lorettotel.com

Web Site: www.lorettotel.net



**North Central Telephone Cooperative
P.O. Box 70
Highway 52 By-Pass
Lafayette, TN 37083**

Voice: 615.666-2151
FAX: 615.666.2085

E-Mail: trowland@nctc.com

Web Site: www.nctc.com



Peoples Telephone Company
P.O. Box 10
224 East Main Street
Bradford, TN 38316

Voice: 931.289.4221
FAX: 931.289.4220



Scott County Telephone Cooperative
P.O. Box 487
Gate City, VA 24251-0487

Voice: 540.452.9119
FAX: 540.452.2447

E-Mail: dano@mountnet.com

Web Site: www.sctc.org



Sprint
112 Sixth Street
Bristol, TN 37260

Voice: 423.968.8383
FAX: 423.968.3148

E-Mail: dennis.wagner@mail.sprint.com

Web Site: www.sprint.com



TELECOM

Tennessee Telephone
Company

TDS Telecom - Knoxville
P.O. Box 22995
Knoxville, TN 37933-0995

Voice: 865.966.4700

FAX: 865.671.4776

E-Mail: bruce.mottern@tdstelecom.com

Web Site: www.tdstelecom.com



Tellico Telephone Company Tellico Telephone Company

P.O. Box 9

102 Spence Street

Tellico Plains, TN 37385-0009

Voice: 423.253-6000

FAX: 423.253.7080

Tennessee Telephone Company:

Tennessee Telephone Company

P.O. Box 155

30502 Broad Street

Bruceton, TN 38317-0155

Voice: 901.586.2223

FAX: 901.586.2114

Tennessee Telephone Company

P.O. Box 100

5265 Murfreesboro Road

LaVergne, TN 37086-0100

Voice: 615.793.8600

FAX: 615.793.6481

Tennessee Telephone Company

P.O. Box 610

264 East Main Street

Parsons, TN 38363-0610

Voice: 901.847.6326

FAX: 901.847.6611

Tennessee Telephone Company

P.O. Box 18139

7407 Andersonville Pike

Knoxville, TN 37938-2139

Voice: 865.922.3300

FAX: 865.922.9515

Tennessee Telephone Company

P.O. Box 1000

11935 Lebanon Road

Mt. Juliet, TN 37121-1000

Voice: 615.773.1150

FAX: 615.758.7117

Tennessee Telephone Company

P.O. Box 433

215 South Main Street

Waynesboro, TN 38485-0433

Voice: 931.722.6800

FAX: 931.722.5815



Twin Lakes Telephone Cooperative

P.O. Box 67

201 West Gore Avenue

Gainesboro, TN 38562-0067

Voice: 931.268.2151

FAX: 931.268.2734

E-Mail: bef@twlakes.net

Web Site: www.twlakes.net



United Telephone Company
P.O. Box 38
120 Taylor Street
Chapel Hill, TN 37034

Voice: 931.364.2289
FAX: 931.364.7202

E-Mail: united@united.net

Web Site: www.united.net



West Kentucky Rural Telephone
P.O. Box 649
237 North 8th Street
Mayfield, KY 42066

Voice: 270.247.4350
FAX: 270.856.3611

E-Mail: tbonn@wk.net

Web Site: www.wk.net



West Tennessee Telephone Company
P.O. Box 10
224 East Main Street
Bradford, TN 38316

Voice: 901.742.2211
FAX: 901.742.2212

Yorkville Telephone Cooperative
P.O. Box 8
2 Yorkville-Neboville Road
Yorkville, TN 38389

Voice: 901.643.6121
FAX: 901.643.6600

E-Mail: ytic@rnet.net